

# **EXHIBIT 5**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**  
**NORTHERN DIVISION**

CYNTHIA PARHAM, JED OPPENHEIM,  
CHERYL GOGGIN, LEAGUE OF WOMEN  
VOTERS MISSISSIPPI, and MISSISSIPPI  
STATE CONFERENCE OF THE NAACP,

Plaintiffs,

v.

MICHAEL D. WATSON, JR., in his official  
capacity as Secretary of State of Mississippi;  
and LYNN FITCH, in her official capacity as  
Attorney General of the State of Mississippi,

Defendants.

Civil Action No. 3:20-cv-572-DPJ-  
FKB

**DECLARATION OF CYNTHIA PARHAM**

Pursuant to 28 U.S.C. § 1746, I, Cynthia Parham, declare as follows:

1. I am over the age of eighteen, and I am competent to make this declaration. I provide this declaration based upon my personal knowledge. I would testify to the facts in this declaration under oath if called upon to do so.
2. I am a Plaintiff in the above-captioned case.
3. I am 61 years old and a resident of Oxford, Mississippi. I am a U.S. citizen and have never lost my right to vote due to felony conviction or court order.
4. I am an African-American woman. I live with my 62-year-old husband in our home in Oxford, Mississippi. We do not live with anyone else.
5. I am registered to vote in Oxford, Mississippi.

6. I currently suffer from heart disease, diabetes, and kidney disease. I have had five heart bypass surgeries and two stents put into my heart. My husband suffers from pulmonary disease. These health conditions put us at higher risk of contracting, suffering severe complications, and potentially dying from COVID-19.

7. Because of my health conditions and my husband's health condition, I have been taking precautions to reduce my risk of contracting COVID-19. I have been limiting my in-person interaction with individuals outside my family, avoiding contact with large groups, and using personal protective equipment when I must go out. I do not leave my home except to go to work, to doctor's appointments, to go grocery shopping, and to occasionally visit my church.

8. I am an insurance agent and own my own business in Oxford. I am one of only a few Black business owners in Oxford. At work, I interact in person with only one employee and a small number of clients, less than ten per week. Since the COVID-19 pandemic began, most of my client interactions take place over the phone. When interacting with my employee and in-person clients, we strictly maintain a six-foot distance. Everyone is required to wear a mask. I wear either a mask or face shield. After every client visit, my employee sprays and wipes down the client's chair and doorknobs with disinfectant.

9. I attend church services virtually and only go to my church in person once a month to pay tithes. When I go to church to pay tithes, I usually stay in my car and hand in my donation through the window to a deacon or trustee. Less frequently, I go inside the church to the fellowship hall table to pay my tithes. On these occasions, I pass only a few people and we all stay socially distanced and wear masks. I sanitize my hands afterwards. Once every few months, I go inside my church to sing for the virtual service. When I sing at my church, I am one of less than ten people

present in the sanctuary. We wear masks and keep at least six feet away from one another the whole time. I remove my mask to sing but otherwise I keep my mask on.

10. I shop for groceries two or three times a week. I try to go as infrequently as possible. When I go shopping, I always wear a mask and stay six feet away from other people. I wash my hands or use hand sanitizer after shopping trips. I do my other non-essential shopping online.

11. The only visitors I have had to my home since the pandemic began are family members and my one insurance business employee.

12. I voted in person in the March 2020 primary election in Mississippi. I ran for County Supervisor during this election as well, although my run was not successful. My uncle inspired me to run for office. He was the first African-American from Oxford to become a medical physician, to my knowledge. He always told me, "Equality is not something you just talk about. It's something you do. If things aren't right, you have to change them."

13. I have been a regular voter since the age of 18. I typically prefer to vote in-person at my local polling place.

14. I plan to vote in the November 2020 elections in Mississippi. I would prefer to vote in person in November. However, because of the severe risk that voting in person at my polling place poses to my health and my husband's health, I need to vote by absentee ballot.

15. I understand that to vote by absentee ballot in Mississippi, I must qualify for an excuse. I understand that for the November election, I do not qualify for any existing excuses to request an absentee ballot.

16. Although there is a new excuse on the application for an absentee ballot relating to COVID-19 for the November 3, 2020 election, it is not clear to me that I qualify for that excuse.

17. If I cannot vote by absentee ballot, I will have to decide whether to vote in person – risking my health and my husband’s health – or not at all. To not vote would be devastating to me. I want and need to vote. I am pushing everyone to vote. I just do not know if I would put my life on the line for it.

18. Voting is extremely important to me. I know that people have died for me to have the right to vote. People have suffered to give me the right to vote. And I want to be able to show my children how important it is to cast a vote. I want them to know that it counts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17<sup>th</sup> day of August 2020.

DocuSigned by:  
*Cynthia Parham*  
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Cynthia Parham